

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

---

MRS. UNITED STATES NATIONAL PAGEANT,  
INC.,

Plaintiff,

vs.

STEPHANIE L. WILLIAMS, CROWN GARLAND  
LLC, and  
COSMOS INTERNATIONAL PAGEANTS, INC.

Defendant.

**PLAINTIFF AND THIRD-  
PARTY DEFENDANT'S  
APPENDIX TO LOCAL  
RULE 56 STATEMENT OF  
FACTS**

Case no. 6:18-cv-06587

---

STEPHANIE L. WILLIAMS, CROWN GARLAND  
LLC, and COSMOS INTERNATIONAL PAGEANTS,  
INC.,

Third-Party Plaintiffs,

v.

ANTHONY ILACQUA,

Third-Party Defendant.

---

Pursuant to Local Rule 56(a)(3), Plaintiff and Third-Party Defendant submits the following Appendix to their Statement of Facts in Support of its Motion for Partial Summary Judgment. (Note that Exhibits C through GG are identical to the exhibits previously filed under those exhibit letters in support of plaintiff's motion for injunction, at Dkt 7-10 to 7-40.)

**APPENDIX**

<b>EXHIBIT A</b>	September 10, 2018 letter from Leclair to State Directors
<b>EXHIBIT B</b>	July 2, 2019 letter from Leclair to State Directors
<b>EXHIBIT C</b>	Trademarks
<b>EXHIBIT D</b>	2016 Licensing Agreement
<b>EXHIBIT E</b>	2017 Licensing Agreement
<b>EXHIBIT F</b>	May 24, 2018 Termination Letter
<b>EXHIBIT G</b>	June 28, 2018 Cease and Desist Letter
<b>EXHIBIT H</b>	July 7, 2018 Email from Mrs. United States to State Directors

<b>EXHIBIT I</b>	August 7, 2018 Email regarding Mrs. DC Facebook messages
<b>EXHIBIT J</b>	November 6, 2017 Email regarding website return
<b>EXHIBIT K</b>	Copper Project Management portal list
<b>EXHIBIT L</b>	March 27, 2019 Email from Williams to North and South Dakota Titleholders
<b>EXHIBIT M</b>	2018 Delegate Agreement
<b>EXHIBIT N</b>	2018 National Pageant Agenda - cover page
<b>EXHIBIT O</b>	June 25, 2018 Crown Garland Facebook post regarding YouTube video
<b>EXHIBIT P</b>	June 25, 2018 Williams Facebook post
<b>EXHIBIT Q</b>	June 26, 2018 Williams Facebook post
<b>EXHIBIT R</b>	Program Book Excerpt
<b>EXHIBIT S</b>	Pageantry Magazine
<b>EXHIBIT T</b>	State Director Agreement 2018 - Katy Moody Cusick
<b>EXHIBIT U</b>	August 24, 2018 Kentucky Cosmos Facebook page
<b>EXHIBIT V</b>	July 4, 2018 email from Williams to State Directors
<b>EXHIBIT W</b>	July 8, 2018 email from Williams to State Directors
<b>EXHIBIT X</b>	State Director Agreement 2018 - Shena Dixon Mason
<b>EXHIBIT Y</b>	July 14, 2018 Email from Williams regarding VA pageant Facebook pages
<b>EXHIBIT Z</b>	July 24, 2018 Tennessee Cosmos Facebook page
<b>EXHIBIT AA</b>	[Blank]
<b>EXHIBIT BB</b>	Mrs. United States National Pageant websites
<b>EXHIBIT CC</b>	Cosmos Pageant websites
<b>EXHIBIT DD</b>	Miss Arnold Teen Fitness Pageant press release
<b>EXHIBIT EE</b>	Tennessee and Kentucky Cosmos Twitter and Instagram pages
<b>EXHIBIT FF</b>	Cosmos Pageant Facebook pages
<b>EXHIBIT GG</b>	Google searches
<b>EXHIBIT HH</b>	Pageant Operating Standards
<b>EXHIBIT II</b>	Program Book - 2018
<b>EXHIBIT JJ</b>	Defendants' Responses to Plaintiff's Request to Admit
<b>EXHIBIT KK</b>	Defendants' Responses to Plaintiff's First Set of Interrogatories
<b>EXHIBIT LL</b>	Transcript of Deposition of Stephanie Williams (Excerpt)

Dated: December 10, 2021

**ADAMS LECLAIR LLP**

s/ Stacey E. Trien

Stacey E. Trien, Esq.

*Attorneys for Plaintiff*

28 E. Main St., Suite 1500

Rochester, New York 14614

Tel: 585-327-4100

strien@adamsleclair.law